## UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	) Bankr. No. 23-20213 JAD
MICHAEL J. OSLACKY AND	
JOYCE L. OSLACKY,	) Chapter 13
Debtors.	)
	) Docket No. 67
ROCKET MORTGAGE,	) Related to Docket No.
	)
Movant,	) Hearing Date & Time:
	)
VS.	) Claim No. 9
MICHAEL J. OSLACKY,	)
JOYCE L. OSLACKY AND	)
RONDA J. WINNECOUR	
CHAPTER 13 TRUSTEE,	)
Respondents.	)

## DECLARATION OF MORTGAGE PAYMENT CHANGE

And Now, comes the Debtors, Michael J. Oslacky and Joyce L. Oslacky, by and through their attorney, who respectfully represents the following:

- $1.\,$  On or about January 31, 2023, Debtor filed for protection under Chapter 13 of the U.S. Bankruptcy Code.
  - 2. Rocket Mortgage filed a Notice of Mortgage Payment Change on 10/31/2024.
- a) The monthly mortgage payment of \$896.02 is being increased to \$896.50 effective 12/1/2024.
  - 3. In all other respects the Declaration that was filed shall remain the same.

WHEREFORE, the Debtors request that this Honorable Court permit the Chapter 13 Trustee to immediately make the monthly mortgage payment according to the above referenced Notice of Mortgage Payment Change commencing with the next distribution in the effective amounts.

Date: 10/31 /2024

Respectfully submitted.
/s/ Rodney D. Shepherd
Rodney D. Shepherd, Esquire
Attorney for the Debtors
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## **CERTIFICATE OF SERVICE**

I, Rodney D. Shepherd, attorney for the Debtors, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 31<sup>st</sup> day of October, 2024, by Electronic Filing, upon the following:

Ronda J. Winnecour, Esquire Chapter 13 Trustee cmecf@chapter13trusteewdpa.com Citizens Bank Attn: Brett Lemon, Esq. blemon@kmllawgroup.com

By: /s/ Rodney D. Shepherd Rodney D. Shepherd Attorney for the Debtors PA I.D. No. 56914 rodsheph@cs.com 2403 Sidney Street Suite 208 Pittsburgh, PA 15203 412 471-9670